

**From:** [Gary Moore](#)  
**To:** [Halasz, Stephen \(Austin,TX-US\)](#)  
**Cc:** [Phillip Winsor](#)  
**Subject:** RE: Falcon update  
**Date:** 06/20/2011 09:30 AM

---

Stephen:

The only restriction that I know of with the recycling of used oil is halogen content. You need to confirm the requirements, but I believe that if it is less than 1000 ppm halogen content then it is assumed to be nonhazardous for recycling purposes. I have no problem if it meets the guidelines for used oil recycling.

Thanks

Gary Moore  
Federal On-Scene Coordinator  
EPA Region 6  
Cell: 214-789-1627  
Work: 214-665-6609  
email: moore.gary@epa.gov

▼ "Halasz, Stephen (Austin,TX-US)" ---06/20/2011 07:20:57 AM---Gary, We will keep you informed and NORCO wants to complete the removal action as quickly as possible

**From:** "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
**To:** Gary Moore/R6/USEPA/US@EPA  
**Cc:** Richard Bergner <rbergner@rflaw.net>  
**Date:** 06/20/2011 07:20 AM  
**Subject:** RE: Falcon update

---

Gary,

We will keep you informed and NORCO wants to complete the removal action as quickly as possible. This week we will finish emptying Tank 10 and will move the equipment to Tank 26 and start putting that water into Tank 30.

An issue has come up with the oil, we've had two oil recyclers come out and analyze the oil. Based on the analytical results they are willing to take the oil and blend it with other oil. Is that ok with you?

**From:** Moore.Gary@epamail.epa.gov  
[mailto:Moore.Gary@epamail.epa.gov]  
**Sent:** Sunday, June 19, 2011 6:30 PM  
**To:** Halasz, Stephen (Austin,TX-US)  
**Subject:** Re: Falcon update



9566783

Stephen:

An email update is perfect. I need to keep aware of what is going on and the progress that is happening. Your updates need to talk about what you have done that week, what is planned for the next week, and where you are on the schedule to complete the Removal Action project. These updates are very important if you intend to convince others that NORCO is serious about not only completing the Removal as agreed but also your commitment to do the RI/FS. If NORCO is not performing on the Removal then it will never get the RI/FS.

Thanks

Gary Moore  
Federal On-Scene Coordinator  
EPA Region 6  
Cell: 214-789-1627  
Work: 214-665-6609  
email: moore.gary@epa.gov

From: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
To: Gary Moore/R6/USEPA/US@EPA  
Cc: Richard Bergner <rbergner@rflaw.net>  
Date: 06/17/2011 09:20 AM  
Subject: Falcon update

---

Gary,

I'll plan on sending you an update each week on Friday, will an email be sufficient or would you like a written report?

All the liquid waste has been transferred from Tanks 17 to 24 into Tank 30. For the last two days we have been pumping from Tank 10 into Tank 30. Last month when we gauged the tanks we were unable to get a liquid volume on Tank 10 due to the sight gauges not working on the tank. Since we began pumping we have estimated that Tank 10 contains approximately 400,000 gallons of water with an inch or two of oil, which is substantially more

than we anticipated. We began picking up some oil so we're renting a frac tank to store the oil. We've obtained a sample and depending on the results we're hoping that Mid-States can recycle the oil once we separate it from the water.

We've contacted the TCEQ and have agreed on a format and the requirements for the land application permit. We anticipate that the permit will take approximately one month to complete.

Stephen Halasz P.G.

Program Manager

yv8uACIAAAAAAAAAAY2IkOmltYWdIMDAXLnBuZ0AwMUNBRTZDNS43NUEyNTg4MA==

TRC Companies, Inc.

505 E. Huntland Dr.

Suite 250

Austin, Texas 78752

512-684-3351 (o)

512-745-6155 (c)

512-329-8750 fax

[shalasz@trcsolutions.com](mailto:shalasz@trcsolutions.com)